

Privilege Log - SC NAACP v. McMaster, Case No. 3:21-cv-03302-JMC-TJH-RMG (D.S.C.)													
Log #	Control Number	Control Beg Attach	Document Category	Author	Email from	Email Sent Date	Email To	Email CC	Date Time Created	Date Time Last Modified	File Name	Privilege	Privilege Description
1	KEY00000025	KEY00000025	Word Doc	Leo Murphy					10/13/2021 19:22	2/2/2022 12:57	South Carolina State Conference Updated Organizational Description for Legal Purposes.docx	AWP	Draft of organizational description of the SC State Conference of the NAACP
2	KEY00000031.0001	KEY00000031	Word Doc	Leo Murphy					10/13/2021 19:22	2/2/2022 12:57	South Carolina State Conference Updated Organizational Description for Legal Purposes.docx	AWP	Draft of the organizational description of the SC State Conference of the NAACP
3	HC00000924		Hard Copy	Leah Aden	Leah Aden [laden@naacpldf.org]	10/1/2021	Brenda Murphy [brendamurph@gmail.com], [REDACTED], Edward Fenster [efenster@naacpnet.org]	Somil Trivedi [strivedi@aclu.org], Dale Ho [dho@aclu.org], Patricia Yan [pyan@aclu.org], Samantha Osaki [sosaki@aclu.org], Scredistrictingteam@naacpldg.org, Leah Aden [laden@naacpldg.org]				AC	Communication between attorneys, client, and expert conveying legal advice, mental impressions, and opinions regarding potential litigation

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Log #	Control Number	Control Beg Attach	Document Category	Email From	Email Sent Date	Email To	Email CC	Author	Date Time Created	Date Time Last Modified	File Name	Privilege	Privilege Description	
1	KEY00000034.0006	KEY00000034	Word Doc					Elias	10/12/2021 13:07	10/22/2021 15:54	South Carolina Redistricting Talking Points DRAFT_v1.docx	AWP	Attorney Work Product re South Carolina redistricting litigation talking points containing attorney thought process and impressions	
2	KEY00000035.0006	KEY00000035	Word Doc					Elias	10/12/2021 13:07	10/22/2021 15:54	South Carolina Redistricting Talking Points DRAFT_v1.docx	AWP	Attorney Work Product re South Carolina redistricting litigation talking point containing attorney thought process and impressions for the purpose of litigation	
3	KEY00000038	KEY00000038	Email	Taiwan scott [/O=FIRST ORGANIZATION/OU=EXCHANGE ADMINISTRATIVE GROUP(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=00067FFE829DC560]	10/10/2021 22:39	Rosa Raspaldo [rraspaldo@pritchardlawgroup.com];Edward Pritchard [epritchard@pritchardlawgroup.com]		Taiwan scott		2/2/2022 10:57	Federal Complaint Advice (20).msg	AC/AWP	Confidential email chain requesting and providing legal advice of counsel regarding redistricting lawsuit containing attorney thoughts and impressions in anticipation of litigation.	
4	KEY00000039	KEY00000039	Email	Taiwan scott [/O=FIRST ORGANIZATION/OU=EXCHANGE ADMINISTRATIVE GROUP(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=00067FFE829DC560]	10/10/2021 22:39	Rosa Raspaldo [rraspaldo@pritchardlawgroup.com];Edward Pritchard [epritchard@pritchardlawgroup.com]		Taiwan scott		2/2/2022 10:57	Federal Complaint Advice.msg	AC/AWP	Confidential email chain requesting and providing legal advice of counsel regarding redistricting lawsuit containing attorney thoughts and impressions in anticipation of litigation.	
5	KEY00000065	KEY00000065	Email	Leah Aden [laden@naacpldf.org]	10/9/2021 15:49	Taiwan scott [taifr@hotmail.com]	John Cusick [jcusick@naacpldf.org];Leah Aden [laden@naacpldf.org]	Leah Aden		2/2/2022 10:57	LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (24).msg	AC/AWP	Confidential Attorney-Client email communication updating clients on redistricting case containing attorney thoughts and impressions	
6	KEY00000066	KEY00000066	Email	Leah Aden [laden@naacpldf.org]	10/9/2021 15:49	Taiwan scott [taifr@hotmail.com]	John Cusick [jcusick@naacpldf.org];Leah Aden [laden@naacpldf.org]	Leah Aden		2/2/2022 10:56	LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps.msg	AC/AWP	Confidential Attorney-Client email communication memorializing attorney-client discussion of lawsuit allegations.	
7	KEY00000112	KEY00000112	Email	John Cusick [jcusick@naacpldf.org]	10/12/2021 12:36	Taiwan scott [taifr@hotmail.com];Leah Aden [laden@naacpldf.org]		John Cusick		2/2/2022 10:54	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (17).msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit and about filing the initial lawsuit. Communication contains attorney thoughts and impressions	
8	KEY00000113	KEY00000113	Email	John Cusick [jcusick@naacpldf.org]	10/10/2021 16:12	Taiwan scott [taifr@hotmail.com];Leah Aden [laden@naacpldf.org]		John Cusick		2/2/2022 10:54	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (22).msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.	
9	KEY00000114	KEY00000114	Email	Taiwan scott [taifr@hotmail.com]	10/10/2021 14:26	Leah Aden [laden@naacpldf.org]	John Cusick [jcusick@naacpldf.org]	Taiwan scott		2/2/2022 10:54	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (23).msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.	
10	KEY00000115	KEY00000115	Email	Leah Aden [laden@naacpldf.org]	10/10/2021 14:53	Taiwan scott [taifr@hotmail.com]	John Cusick [jcusick@naacpldf.org];Leah Aden [laden@naacpldf.org]	Leah Aden		2/2/2022 10:54	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps.msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.	

Log #	Control Number	Control Beg Attach	Document Category	Email From	Email Sent Date	Email To	Email CC	Author	Date Time Created	Date Time Last Modified	File Name	Privilege	Privilege Description
11	KEY00000132.0001	KEY00000132	Email	Taiwan scott [/O=FIRST ORGANIZATION/OU=EXCHANGE ADMINISTRATIVE GROUP(FDIBOHF23SPDLT)/CN= RECIPIENTS/CN=00067FFE829DC 560]	10/10/2021 22:39	Rosa Raspaldo [rraspaldo@pritchardlawgroup.com];Edward Pritchard [epritchard@pritchardlawgroup.com]		Taiwan scott	1/23/2022 15:32	1/23/2022 15:32	Federal Complaint Advice.msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.
12	KEY00000132.0007.0006	KEY00000132	Email					Elias	10/12/2021 13:07	10/22/2021 15:54	South Carolina Redistricting Talking Points DRAFT_v1.docx	AWP	Attorney Work Product re South Carolina redistricting lawsuit talking points containing attorney thought process and impressions
13	KEY00000132.0008.0006	KEY00000132	Word Doc					Elias	10/12/2021 13:07	10/22/2021 15:54	South Carolina Redistricting Talking Points DRAFT_v1.docx	AWP	Attorney Work Product re South Carolina redistricting lawsuit talking points containing attorney thought process and impressions
14	KEY00000134.0001	KEY00000134	Email	Leah Aden [laden@naacpldf.org]	10/9/2021 15:49	Taiwan scott [taifr@hotmail.com]	John Cusick [jcusick@naacpldf.org];Leah Aden [laden@naacpldf.org]	Leah Aden	1/23/2022 15:30	1/23/2022 15:30	LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps.msg	AC/AWP	Confidential Attorney-Client email communication memorializing attorney-client discussion of lawsuit allegations.
15	KEY00000135.0001	KEY00000135	Email	Leah Aden [laden@naacpldf.org]	10/9/2021 15:49	Taiwan scott [taifr@hotmail.com]	John Cusick [jcusick@naacpldf.org];Leah Aden [laden@naacpldf.org]	Leah Aden	1/23/2022 15:30	1/23/2022 15:30	LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (24).msg	AC/AWP	Confidential Attorney-Client email communication memorializing attorney-client discussion of lawsuit allegations.
16	KEY00000138.0017	KEY00000138	Email	John Cusick [jcusick@naacpldf.org]	10/12/2021 12:36	Taiwan scott [taifr@hotmail.com];Leah Aden [laden@naacpldf.org]		John Cusick	1/23/2022 15:29	1/23/2022 15:29	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (17).msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on filing the amended complaint and talking points. Communication obtainis attorney thought process and impressions
17	KEY00000138.0018	KEY00000138	Email	John Cusick [jcusick@naacpldf.org]	10/10/2021 16:12	Taiwan scott [taifr@hotmail.com];Leah Aden [laden@naacpldf.org]		John Cusick	1/23/2022 15:29	1/23/2022 15:29	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (22).msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.
18	KEY00000138.0019	KEY00000138	Email	Taiwan scott [taifr@hotmail.com]	10/10/2021 14:26	Leah Aden [laden@naacpldf.org]	John Cusick [jcusick@naacpldf.org]	Taiwan scott	1/23/2022 15:29	1/23/2022 15:29	Re_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps (23).msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.
19	KEY00000138.0021	KEY00000138	Email	Leah Aden [laden@naacpldf.org]	10/10/2021 14:53	Taiwan scott [taifr@hotmail.com]	John Cusick [jcusick@naacpldf.org];Leah Aden [laden@naacpldf.org]	Leah Aden	1/23/2022 15:29	1/23/2022 15:29	RE_LDF_SC NAACP_ACLU_and ACLU of SC Proposed Redistricting Maps.msg	AC/AWP	Confidential Attorney-Client email chain communication updating clients on redistricting lawsuit by providing an overview of allegations and issues involving an unrelated litigation. Communication contains attorney thoughts and impressions. Communication was made in anticipation of litigation.
20	KEY00000142.0014.0001	KEY00000142	Word Doc					User	8/26/2018 11:18	8/26/2018 11:50	180826 Questions for House candidates.docx	AWP	Attorney Work Product (draft) re South Carolina redistricting forum containing attorney thought process and impressions